

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
DWAYNE LEE CARR	:	
NIURCA ZENaida CARR	:	CASE NO. 1:17-bk-00987
fka Niurca Zenaida Wehler	:	
Debtors	:	
	:	
FLAGSTAR BANK FSB, servicing agent	:	
for Pingora Loan Servicing, LLC,	:	
Movant	:	
	:	
v.	:	
	:	
DWAYNE LEE CARR	:	
NIURCA ZENaida CARR	:	
fka Niurca Zenaida Wehler,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtors' review of payments made.
7. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtors' review of payments made.
8. Denied that Movant has demonstrated cause for relief from stay .

9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com